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**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 17-79, Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84**

Dear Ms. Dortch:

As Verizon's chief network engineering officer observed, the Commission's *Declaratory Ruling and Third Report and Order*<sup>1</sup> in this proceeding is a "critical step toward making our nation's 5G future a reality, sooner rather than later" by "reduc[ing] the time and cost of small cell deployments ...."<sup>2</sup> Those comments, from the day the Commission adopted its order, reflect Verizon's consistent view that the reforms like those adopted by the Commission will allow providers to deploy wireless infrastructure more quickly and at a lower cost, enabling finite capital expenditure resources to be used to provide advanced wireless services like 5G to more consumers in more areas.<sup>3</sup> But, in a recently filed motion to stay the FCC Order, some localities have mischaracterized a statement made by a Verizon officer in a different context to suggest that staying the order will not harm other parties including wireless providers.<sup>4</sup> This claim is wrong.

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<sup>1</sup> *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, WT Docket No. 17-79, *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, WC Docket No. 17-84, Declaratory Ruling and Third Report and Order (rel. Sep. 27, 2018) ("FCC Order").

<sup>2</sup> Statement of Nicola Palmer, Verizon chief network engineering officer and head of wireless networks (Sep. 26, 2018), available at <https://www.verizon.com/about/news/next-generation-networks-require-next-generation-infrastructure> ("Palmer Statement").

<sup>3</sup> See, e.g., Letter from Tamara Preiss, Verizon, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 17-79, WC Docket No. 17-84 (Aug. 10, 2018) at 3 ("Capital budgets are finite. When providers are forced to spend more to deploy infrastructure in one locality, there is less money to spend in others. The leverage that some cities have to extract high fees means that other localities will not enjoy next generation wireless broadband services as quickly, if at all.").

<sup>4</sup> Motion for Stay of the National League of Cities, *et al.* ("Movants"), WT Docket No. 17-79, WC Docket No. 17-84 (Oct. 31, 2018) ("Stay Motion") at 4, 29-30 (quoting Verizon CFO Matt Ellis, Verizon Communications Inc. Q3 2018 Earnings Call (Oct. 23, 2018), available at

Verizon's public statements about the FCC Order have consistently emphasized that Verizon plans to lead the U.S. in deploying 5G wireless technology; that it plans to continue to invest billions of dollars annually on infrastructure deployment; and that FCC action to eliminate cost and other barriers will allow finite capital expenditure budgets to go farther and reach more places.<sup>5</sup> While the parties seeking a stay point to a statement by Matt Ellis, Verizon's Chief Financial Officer, concerning the impact of the order on Verizon's overall capital expenditures, subsequent statements by Mr. Ellis make crystal clear the importance of the FCC's Order in facilitating (and maximizing) 5G deployment. Earlier this month, Mr. Ellis reiterated that "The FCC's order ... was hugely important. . . . Capital budgets are finite, after all, so the more we have to spend to deploy infrastructure in one locality means that we have less money to spend elsewhere. The FCC's actions help ensure that more Americans gain access more quickly to 5G services."<sup>6</sup> And just this week, at a European investors' conference, Mr. Ellis stated that the FCC Order requiring municipalities to "get 5G site approvals done within a certain time frame and at a certain cost that's lower than where a lot of them have been" will benefit 5G deployment and "will help us go forward here, continuing to deploy the network and getting 5G built out as quickly as possible."<sup>7</sup>

These statements leave no doubt that the FCC Order will have a significant positive effect on 5G deployment and provide significant benefits to consumers and to the United States' chances of leading the world in 5G.

Sincerely,



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<https://www.verizon.com/about/investors/quarterly-reports/3q-2018-quarter-earnings-conference-call-webcast>).

<sup>5</sup> See, e.g., Palmer Statement; C-Span, *The Communicators with Nicola Palmer, Vice-President and Chief Network Officer* (Oct. 23, 2018), available at <https://www.c-span.org/video/?453505-1/communicators-nicola-palmer> (stating that the FCC order "gives us some certainty around a cost structure, certainty around time frame, and it allows us to work with local municipalities with a frame work that makes sense").

<sup>6</sup> Statement of Matt Ellis, Verizon Executive Vice President and Chief Financial Officer (Nov. 2, 2018), available at <https://twitter.com/VerizonPolicy/status/1058372518820659201>.

<sup>7</sup> Verizon Communications, Inc. (VZ) Presents at Morgan Stanley European Technology, Media & Telecom Broker Conference Call (Nov. 14, 2018), available at <https://www.verizon.com/about/investors/morgan-stanley-european-technology-media-telecom-conference-2018>.